

Exhibit 140

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1



EXHIBIT / ATTACHMENT

41

(To be scanned in place of tab)

COMMERCE BANK
P O BOX 898
COLLEGE PARK MD 20740

011 01 01 PAGE: 1
DATE: 04/30/98 ACCOUNT: [REDACTED] 0424
DOCUMENTS: 1

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST
P O BOX 1297
HERNDON VIRGINIA 20170

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1

MONEY MARKET ACCOUNT [REDACTED] 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
BALANCE LAST STATEMENT			03/31/98	5841,148.35
CHECK	5800,000.00		04/02/98	41,148.35
INTEREST		626.35	04/30/98	41,774.70
BALANCE THIS STATEMENT			04/30/98	41,774.70
TOTAL CREDITS (1)	626.35			
TOTAL DEBITS (1)	5,800,000.00			

YOUR CHECKS SEQUENCED

DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT

04/02 5800,000.00 0402-0200082400

- - - - - I N T E R E S T - - - - -

AVERAGE LEDGER BALANCE:	234,481.68	INTEREST EARNED:	626.35
AVERAGE AVAILABLE BALANCE:	234,481.68	DAYS IN PERIOD:	30
INTEREST PAID THIS PERIOD:	626.35	ANNUAL PERCENTAGE YIELD EARNED:	3.30%
INTEREST PAID 1998:	5,837.44		
TAX IDENTIFICATION NUMBER:	**PROVIDE**		
INTEREST RATE:	3.2500%		



EXHIBIT / ATTACHMENT

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Humana Charitable Trust**VIA TELEFAX 301 220 2697**

To: Tom Herman
Vice President
Commerce Bank
From: M. Yaqub Mirza *MM-YM*
Subject: Wire Transfer
Date: March 31, 1998

You are kindly requested to wire from Humana Charitable Trust Account # [REDACTED] 0424 the amount of \$5,800,000 (Five Million Eight Hundred Thousand Dollars) value dated April 2, 1998 as follows:

Bank: Chase Manhattan Bank
New York, N.Y.

ABA # 021000021

for credit to Account No. [REDACTED] 1902 of

Chase Manhattan Private Bank
(Jersey) Channel Islands JE4 80H

Tel: 01 531 626 262

for further credit to Account No. [REDACTED] 5383 of Shaikh Sulaiman A. Al Rajhi

Ref: Payment Key Overseas loan

Best Regards.

TRANSACTION REPORT

MAR-31-98

FOR: MARJAC INVESTMENTS, INC. 703 471 1211

SEND:

DATE	START	RECEIVER	PAGES	TIME	NOTE
MAR-31	10:52 AM	COMMERCE B	1	46"	OK

04/01/1998 09:09 09956-1-4602040

ABDULLAH S. AL RAJHI

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MSG NO : 0090
TO : Dr. M. Y. Mirza
Fax : 703 471 1211
Date : 04.01.98

MESSAGE:

Re : USD24.00

As Salamu Alaykum,

Thank you for your message of March 31. Please make the payment of the above amount to the following account:-

A/c No [REDACTED] 5383 REF. 205629 01
Chase Manhattan Private Bank,
PO Box 127, Chase House, Grenville Street
St Helier, Jersey JE4 8QH
Channel Islands
Favour Laith Limited

Wa Asalamu Alyakum,

Buehra

Humana Charitable Trust
G:\SCANNED DOCUMENTS 2\TIFF\IMG\0700400000530

TELEFAX 301 220 2697

Tom Herman
Vice President
Commerce Bank
M. Yaqub Mirza *3-4-1998*
Wire Transfer
March 31, 1998

From:
Subject:
Date:

You are kindly requested to wire from Humana Charitable Trust Account # [REDACTED] 0424 the amount of \$5,800,000 (Five Million Eight Hundred Thousand Dollars) value dated April 2, 1998 as follows:

Bank: Chase Manhattan Bank
New York, N.Y.

ABA # 021000021

for credit to Account No [REDACTED] 1902 of

Chase Manhattan Private Bank
(Jersey) Channel Islands JE4 8QH

Tel: 01 531 626 262

for further credit to Account No [REDACTED] 5383 of Shaikh Sulaiman A. Al Rajhi
Ref 26562901

Ref: Payment Key Overseas loan

Best Regards.



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

To: Mr. Bushra Ahmed
Office of Mr. Abdullah S. Al Rajhi
From: M. Yaqub Mirza
Subject: Payment of loan
Date: April 1, 1998

Assalamu 'Alaikum and Eid Mubarak

Reference my discussion with Mr. Abdullah Al Rajhi and your fax, we wish to inform you that we have made the following transfers yesterday:

1. Commerce Bank, Maryland	\$5.8 m.
2. Credit Agricole Indosuez Zurich	12.2 m.
3. Bank Leu, Geneva	<u>6.0 m</u>

to Chase (New York) for further credit to Chase (Jersey), Channel Islands, Acct. # 5383 of Shaikh Sulaiman.

Value Date: April 2

Please acknowledge receipt of funds.

Thanks,

Wassalaam.

TRANSACTION REPORT

APR-01-98 08:13:56 AM

FROM: DAPTRC INVESTMENTS, INC. 703 471 1211

SEND

DATE	START	RECEIVER	PAGES	TIME	NOTE
APR-01	08:13:55 AM	R.S.RAJHI	1	46"	OK

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EXHIBIT / ATTACHMENT

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COMMERCE BANK
P O BOX 842
COLLEGE PARK MD 20740

011 01 01 PAGE: [REDACTED] 1
DATE: 12/31/98 ACCOUNT: [REDACTED] 0424
DOCUMENTS: [REDACTED] 1

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST
P O BOX 1297
HERNDON VIRGINIA 20170

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MONEY MARKET ACCOUNT [REDACTED] 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
BALANCE LAST STATEMENT			11/30/98	6707,494.20
MISCELLANEOUS CREDIT		100,000.00	12/08/98	6807,494.20
WIRE FR GROVE CORP. REF: NONE		30,000.00	12/09/98	6837,494.20
WIRE FEE	10.00		12/09/98	6837,484.20
WIRE TO CHASE NYC FBO: S. RAJHI	6800,000.00		12/14/98	37,484.20
CHECK # 1001	4,836.58		12/29/98	32,647.62
REST		6,069.01	12/31/98	38,716.63
BALANCE THIS STATEMENT			12/31/98	38,716.63
TOTAL CREDITS (3)	136,069.01			
TOTAL DEBITS (3)	6,804,846.58			

YOUR CHECKS SEQUENCED

DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT

12/29 1001 4,836.58 1229-0100000170

- - - - - I N T E R E S T - - - - -

AVERAGE LEDGER BALANCE:	2,858,309.04	INTEREST EARNED:	6,069.01
AVERAGE AVAILABLE BALANCE:	2,858,309.04	DAYS IN PERIOD:	31
INTEREST PAID THIS PERIOD:	6,069.01	ANNUAL PERCENTAGE YIELD EARNED:	2.53%
INTEREST PAID 1998:	55,795.66		
TAX IDENTIFICATION NUMBER:	**PROVIDE**		
INTEREST RATE:	2.5000%		



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

COMMERCIAL BANK
REQUEST FOR WIRE TRANSFERDate Dec 01, 98 G:\SCANNED DOCUMENTS\TIFF\IMG108000000014 REF #AMOUNT: 6,800,000.00 (PLUS APPLICABLE CHARGES)
(U.S. Dollars)

(Six million eight hundred thousand)

BANK TO RECEIVE FIRE

ABA/Routing No. _____

Bank Short Name _____

Bank Name CHASE MANHATTAN PRIVATE BANK

Address _____

St Heller, Jersey JE4 8QHFOR CREDIT TOName(s) SHAIKH SULAIMAN A. AL RAJHIAccount Number 5383

Special Instr. _____

Payment of loanCUSTOMER INFORMATION

VALUE DATE: Dec 14, 98

Account Name(s) Humana Charitable TrustAddress P. O. Box 1297Henderson, VA 20170Telephone Number 703-471-9494 Account Number 0424

I hereby authorize Commerce Bank (the Bank) to charge my account as listed above. I understand that the Bank is not responsible for any loss which may be sustained by acting upon my wire transfer instructions, except for a loss caused by the Bank's error or omission.

Dr. Y. M. S.
Customer's Signature

Customer's Identification

BRANCH MANAGER APPROVAL _____



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

COMMERCE BANK
P O BOX 898
COLLEGE PARK MD 20740

011 01 01 PAGE: 1
DATE: 08/31/98 ACCOUNT: 0424
DOCUMENTS: 0

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST
P O BOX 1297
HERNDON VIRGINIA 20170

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0

MONEY MARKET ACCOUNT 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
BALANCE LAST STATEMENT			07/31/98	42,117.85
MISCELLANEOUS CREDIT		3000,000.00	08/12/98	3042,117.85
INTEREST		5,458.72	08/31/98	3047,576.57
BALANCE THIS STATEMENT			08/31/98	3047,576.57
TOTAL CREDITS (2)	3,005,458.72			
TOTAL DEBITS (0)	.00			

- - - - - I N T E R E S T - - - - -

AVERAGE LEDGER BALANCE:	1,977,601.72	INTEREST EARNED:	5,458.72
AVERAGE AVAILABLE BALANCE:	1,977,601.72	DAYS IN PERIOD:	31
INTEREST PAID THIS PERIOD:	5,458.72	ANNUAL PERCENTAGE YIELD EARNED:	3.30%
INTEREST PAID 1998:	11,639.31		
TAX IDENTIFICATION NUMBER:	**PROVIDE**		
INTEREST RATE:	3.2500%		

DEBIT	GENERAL LEDGER	COMMERCE BANK COLLEGE PARK, MD	FEDERAL RESERVE BANK
ACCOUNT TITLE	ACCOUNT NUMBER [REDACTED] 6780		
DATE	8-12-98		
DESCRIPTION		AMOUNT	
<i>Acme W/T Humana Charitable Tr</i>			
CONTRA ENTRY	<i>BS</i>		
DRAWN BY	APPROVED BY	TOTAL <i>3,000,000.00</i>	
[REDACTED] 7801 [REDACTED]			

DATE	8-12-98	COMMERC BANK	[REDACTED]	4231
BY	BG	COLLEGE PARK, MD	[REDACTED]	042-4
WE CREDIT YOUR ACCOUNT		\$ 3,000,000.00		
FOR		Incoming Wire Transfer from First Union Va		
orig: Saar Foundation				
Humana Charitable Trust		DO NOT FILE TODAY'S ENTRY IN YOUR DAILY LOG		
P. O. Box 1397				
Herndon, Virginia 20170				
[REDACTED]		04240 [REDACTED]		
MISC. CREDIT				